

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JESSICA BIGGS,

Plaintiff,

v.

CHICAGO BOARD OF EDUCATION,

Defendant.

No. 1:18-cv-06183

Hon. Mary M. Rowland

PARTIES' JOINT STATUS REPORT

Plaintiff Jessica Biggs and Defendant Chicago Board of Education hereby submit this joint status report pursuant to this Court's May 6, 2020 order (Dkt. 69):

(a) Discovery progress.

- The parties have exchanged written discovery and continue to coordinate on additional written discovery, as needed.
- Defendants took Plaintiff's deposition on January 2 and January 9, 2020.
- Plaintiff anticipates a minimum of 4 additional witnesses.
- Plaintiff took five hours of the deposition of Deputy Chief Felicia Sanders on August 6, 2020. The remaining time for the deposition is set to occur on September 17, 2020.
- The deposition of OIG investigator Robert McGowan began on August 20, 2020 but will need to be continued after he obtains counsel.
- The parties have mutual availability for depositions on September 15, 18, and 21-25 and hope to schedule most of the remaining depositions for that time.

(b) Unresolved motions. None.

(c) Settlement efforts. Plaintiff provided Defendant with a prelitigation settlement demand on August 31, 2018 and a supplemental settlement demand on May 2, 2019. On January 17, 2020,

this Court referred parties to Judge Kim for settlement conference. Per Judge Kim's order, Plaintiff provided a copy of her settlement position on February 21, 2020. On February 27, 2020, Defendant notified Judge Kim that they did not believe that a settlement conference would be productive, and the settlement conference was cancelled. Because Defendant has not responded to Plaintiff's demands with a settlement offer, the parties do not believe settlement will be possible.

- (d) **Agreed proposed 45-day schedule.** The parties have mutual availability for depositions on September 15, 18, and 21-25 and hope to schedule most of the remaining depositions for that time.
- (e) **Agreed proposed revised discovery and dispositive motion schedule.** There is no dispositive motion deadline. The parties agree an extension until November 19, 2020 to conduct discovery is necessary.
- (f) **Agreed requests for action.** An extension to conduct discovery until November 19, 2020.
- (g) **Telephonic hearing.** The Parties do not believe this is necessary.

Dated: September 4, 2020.

Respectfully submitted,

COUNSEL FOR PLAINTIFF

/s/ Andrew D. Finke

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**DEFENDANT BOARD OF EDUCATION OF THE
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CERTIFICATE OF SERVICE

The undersigned attorney certifies that a copy of the foregoing document was filed and served on all counsel of record via the Court's ECF system.

s/ Andrew D. Finke

Attorney for Plaintiff